

PETER C. ANDERSON  
UNITED STATES TRUSTEE  
ABRAM S. FEUERSTEIN, SBN 133775  
ASSISTANT UNITED STATES TRUSTEE  
EVERETT L. GREEN, SBN 237936  
TRIAL ATTORNEY  
UNITED STATES DEPARTMENT OF JUSTICE  
OFFICE OF THE UNITED STATES TRUSTEE  
3801 University Avenue, Suite 720  
Riverside, CA 92501-2804  
Telephone: (951) 276-6990  
Facsimile: (951) 276-6973  
Email: Everett.L.Green@usdoj.gov

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**RIVERSIDE DIVISION**

In re:

SHAMICKA LAWRENCE,

Debtor.

Case No. 6:23-bk-15163-WJ

CHAPTER 7

**DECLARATION OF EVERETT L. GREEN IN  
SUPPORT OF STIPULATION BETWEEN  
UNITED STATES TRUSTEE AND  
DEBTOR TO PRODUCE DOCUMENTS AND  
CONDUCT AN EXAMINATION PURSUANT  
TO FEDERAL RULE OF BANKRUPTCY  
PROCEDURE 2004 AND LOCAL  
BANKRUPTCY RULE 2004-1**

[No Hearing Required Pursuant to LBR 9013-1(p)]

I, Everett L. Green, hereby declare:

1. I am an attorney duly authorized to practice law in the State of California and before this Court. I serve as a Trial Attorney to the United States Trustee for Region 16, Riverside District Office. I submit this declaration in support of the stipulation between U.S. Trustee and Chapter 7 debtor, Shamicka Lawrence ("Debtor" and collectively, "Parties"), to produce documents and conduct an examination pursuant to Federal Rule of Bankruptcy Procedure 2004 and Local Bankruptcy Rule of Procedure 2004-1 ("Stipulation").



# Exhibit 1

**DOCUMENT REQUEST**

**DEFINITIONS**

A. “DOCUMENT” or “DOCUMENTS” is used in the broadest sense possible and includes, without limitation, the following items, whether printed, recorded or reproduced by any other mechanical process or written or produced by hand: billing statements, invoices, fee statements, any and all requests for payment, papers; books; letters; tangible things; records; correspondence; e-mails; electronic COMMUNICATIONS; postings on the Internet; telegrams; cables; telex messages; memoranda; diaries; reports; notes; notations; work papers; financial records; COMMUNICATIONS; summaries; transcripts; records of conversations; interviews; meetings; telephone conversations or conferences; minutes; audio or videotapes; cassettes or disks; contracts; agreements; business records; books of account; ledgers; journals; checks, receipts; invoices; financial statements; and any writings as defined by Rule 1001 of the Federal Rules of Evidence. DOCUMENTS also means and includes bank statements, monthly checking and saving account statements, deposit slips, withdrawals, cancelled checks, pay advices, pay check stubs and invoices, tax returns and reports sent to the Internal Revenue Service, the California Franchise Tax Board or the taxing authority of any state where the DEBTOR resides, all documents purporting to create liens, mortgages, security agreements, pledges, or other encumbrances on real or personal property, any lists of real property owned or leased.

B. “COMMUNICATION” means and includes all oral and written communications of any nature, type, or kind, including, but not limited to, any DOCUMENTS, telephone conversations, discussions, meetings, facsimiles, e-mails, memoranda, and any other medium through which any information is conveyed, transmitted, or memorialized.

C. “CONCERNING” means and includes, relating to, regarding, bearing upon, supporting, summarizing, alluding to, depicting, involving, constituting, defining, evidencing, mentioning, containing, describing, discussing, embodying or in any way pertaining to.

D. “YOU” or “YOUR” means Shamicka Lawrence as well as each person, agent, representative, servant, employee, attorney, or accountant acting or purporting to act on YOUR behalf.

1 E. "TRANSFEROR" means Iyanna Lawrence as well as each person, agent, representative,  
2 servant, employee, attorney, or accountant acting or purporting to act on her behalf.

3 F. "ENTITIES" means the Lawrence-Related Entities reported on Attachment B19 of  
4 Schedule A/B and any other entity owned or controlled by YOU or in which YOU held an ownership  
5 interest from 2017 to 2023.

6 G. "PRE-PETITION TRANSFER" means the transfer of \$1.9 million to the TRANSFEROR  
7 from the Joyfully Gifted, Inc. bank account on June 20, 2022.

8 **INSTRUCTIONS**

9 A. Each request contained herein extends to any DOCUMENTS in YOUR possession,  
10 custody, or control. A DOCUMENT is deemed to be in YOUR possession, custody, or control, (1) if it is  
11 in YOUR physical custody, or (2) if it is in the physical custody of any other entity and YOU have a right  
12 by contract, statute, or law to inspect, examine, request, or copy such DOCUMENT on any terms. Such  
13 DOCUMENTS shall include, without limitations, DOCUMENTS that are in the custody of YOUR  
14 attorneys or other agents.

15 B. When responding to the demand for production of a DOCUMENT, YOU are requested to  
16 respond in writing and state as to each of the Requests for Production;

17 (i) that there are such DOCUMENTS, and they will be produced;

18 (ii) that there are such DOCUMENTS, that they have been already produced and  
19 identify the documents that have been produced;

20 (iii) that there are such DOCUMENTS, but you refuse to produce them because of a  
21 claim of privilege, or for some other reason; or

22 (iv) that there are no such DOCUMENTS as requested by the particular request.

23 C. If a claim of privilege is asserted as to the production of any DOCUMENT which falls  
24 within the Requests for Production specified below, please state as to each DOCUMENTS the following  
25 information:

26 (i) the privilege claimed;

27 (ii) the basis of the privileged claimed;

28 (iii) the nature of the DOCUMENT, e.g., letter, bank statement, etc.;

(iv) the date the DOCUMENT bears;

- 1 (v) the identity of each individual or entity to whom the DOCUMENT was sent and/or  
2 who are shown to the DOCUMENT as receiving copies;  
3 (vi) a statement of the subject matter of the DOCUMENT; and  
4 (vii) a precise description of the place where the DOCUMENT is presently kept.

5 D. If any DOCUMENT requested is unavailable or destroyed, list each such DOCUMENT  
6 and describe when and why it was destroyed, or why it is unavailable.

7 E. If a DOCUMENT exists only within the memory of a computer or computer disc, a copy of  
8 that data should be produced in machine-readable form, and a "hard" copy of the DOCUMENT should be  
9 printed and produced.

10 F. Wherever used herein, the singular shall include the plural and vice versa, whenever such  
11 construction results in a broader request for information.

12 G. The words "and", "or", and "and/or" are interchangeable and shall be construed either  
13 disjunctively or conjunctively or both, as broadly necessary to bring within the scope of these Requests for  
14 Production those responses that might otherwise by construed to be outside the scope.

15 **REQUEST FOR PRODUCTION**

16 1. All DOCUMENTS of loans or funds borrowed from the TRANSFEROR to YOU from  
17 2017 to 2024.

18 2. All DOCUMENTS CONCERNING loans or funds borrowed from the TRANSFEROR to  
19 the ENTITIES from 2017 to 2024.

20 3. All COMMUNICATIONS between YOU and the TRANSFEROR CONCERNING loans  
21 or funds borrowed from the TRANSFEROR from 2017 to 2024.

22 4. All COMMUNICATIONS between YOU and third parties, including The Lawrence  
23 Children's Trust u/t/a dated May 6, 2014, CONCERNING loans or funds borrowed from the  
24 TRANSFEROR from 2017 to 2024.

25 5. All DOCUMENTS CONCERNING how YOU spent the proceeds borrowed from the  
26 TRANSFEROR from 2017 to 2024.

27 6. All DOCUMENTS CONCERNING how the ENTITIES spent the proceeds borrowed from  
28 the TRANSFEROR from 2017 to 2024.

1           7.       All DOCUMENTS CONCERNING repayment of the loans or funds borrowed from the  
2 TRANSFEROR by YOU from 2017 to 2024.

3           8.       All DOCUMENTS CONCERNING repayment of the loans or funds borrowed from the  
4 TRANSFEROR by the ENTITIES from 2017 to 2024.

5           9.       All COMMUNICATIONS between YOU and the TRANSFEROR CONCERNING  
6 repayment of the loans or funds borrowed from the TRANSFEROR from 2017 to 2024.

7           10.      All COMMUNICATIONS between YOU and third parties, including The Lawrence  
8 Children's Trust u/t/a dated May 6, 2014, CONCERNING repayment of the loans or funds borrowed from  
9 the TRANSFEROR from 2017 to 2024.

10          11.      All COMMUNICATION between YOU and third parties, including The Lawrence  
11 Children's Trust u/t/a dated May 6, 2014, CONCERNING repayment of the loans or funds borrowed from  
12 the TRANSFEROR by the ENTITIES from 2017 to 2024.

13          12.      All DOCUMENTS CONCERNING demands or request for repayment of loans or funds  
14 borrowed from the TRANSFEROR from 2017 to 2024.

15          13.      All COMMUNICATIONS CONCERNING demands or request for repayment of loans or  
16 funds borrowed from the TRANSFEROR from 2017 to 2024.

17          14.      All DOCUMENTS relating to the PRE-PETITION TRANSFER.

18          15.      All COMMUNICATIONS between YOU and the TRANSFEROR regarding the PRE-  
19 PETITION TRANSFER.

20          16.      All COMMUNICATIONS between YOU and third parties, including The Lawrence  
21 Children's Trust u/t/a dated May 6, 2014, regarding the PRE-PETITION TRANSFER.

22          17.      All DOCUMENTS CONCERNING YOUR financial condition from 2017 to 2024.

23          18.      All DOCUMENTS CONCERNING the financial condition of the ENTITIES,  
24 including but not limited to cash flow statements, balance sheets, profit and loss statements, of the  
25 ENTITIES from 2017 to 2024.

26          19.      State and federal tax returns for YOU from 2017 to 2024.

27          20.      State and federal tax returns for the ENTITIES FROM 2017 to 2024.

28          21.      All loan applications or requests for credit by YOU from 2017 to 2024.

1           22.     All DOCUMENTS of loans or funds granted by the Small Business Administration,  
2 including but not limited to the Paycheck Protection Program and COVID-19 Economic Injury Disaster  
3 Loans, to the ENTITIES.

4           23.     All DOCUMENTS of agreements to repay loans or funds granted by the Small Business  
5 Administration, including but not limited to the Paycheck Protection Program and COVID-19 Economic  
6 Injury Disaster Loans, to the ENTITIES.

7           24.     All DOCUMENTS CONCERNING how the ENTITIES used the proceeds of loans or  
8 funds granted by the Small Business Administration, including but not limited to the Paycheck Protection  
9 Program and COVID-19 Economic Injury Disaster Loans.

10          25.     All COMMUNICATIONS CONCERNING how the ENTITIES used the proceeds of loans  
11 or funds granted by the Small Business Administration, including but not limited to the Paycheck  
12 Protection Program and COVID-19 Economic Injury Disaster Loans.

13          26.     All DOCUMENTS CONCERNING repayment of loans or funds granted by the Small  
14 Business Administration, including but not limited to the Paycheck protection Program and COVID-19  
15 Economic Injury Disaster Loans, to the ENTITIES.

16          27.     All COMMUNICATIONS between YOU and third parties CONCERNING repayment of  
17 loans or funds granted by the Small Business Administration, including but not limited to the Paycheck  
18 protection Program and COVID-19 Economic Injury Disaster Loans, to the ENTITIES.

19          28.     All COMMUNICATIONS between YOU and the TRANSFEROR CONCERNING  
20 repayment of loans or funds granted by the Small Business Administration, including but not limited to  
21 the Paycheck Protection Program and COVID-19 Economic Injury Disaster Loans, to the ENTITIES.

22          29.     All DOCUMENTS CONCERNING a demand or request for repayment of loans or funds  
23 by the Small Business Administration borrowed from the TRANSFEROR.

24          30.     All COMMUNICATIONS CONCERNING a demand or request for repayment of loans or  
25 funds borrowed from the TRANSFEROR.

26          31.     All DOCUMENTS of payments to Axis Wealth management Services, LL Co or any other  
27 third-party CONCERNING services for loans offered by the Small Business Administration.  
28



1           32.     Credit card statements and/or charge account held, used, or maintained by YOU  
2 individually and/or jointly with any other or others, or any other accounts YOU were or are authorized to  
3 charge purchases to the accounts of another person or entity (regardless of whether or not the account or  
4 accounts have been closed), from 2020 to 2024.

5           33.     Credit card statements and/or charge account held, used, or maintained by YOU  
6 individually and/or jointly with any other or others, or any other accounts YOU were or are authorized to  
7 charge purchases to the accounts of another person or entity (regardless of whether or not the account or  
8 accounts have been closed), for the ENTITIES from 2020 to 2024.

9           34.     Bank account statements, including cancelled checks, for all accounts reported on Schedule  
10 A/B, and any account that YOU owned, controlled, held interests, or signatory authority from 2017 to  
11 2024.

12          35.     Bank account statements, including cancelled checks, owned by the ENTITIES from 2017  
13 to 2024.

14          36.     Federal and state tax returns filed by the ENTITIES from 2017 to 2023, including W-2  
15 forms, 1099 forms, all schedules, and any other forms related to income.

16          37.     Federal and state tax returns filed by YOU from 2017 to 2023, including W-2 forms, 1099  
17 forms, all schedules, and any other forms related to income.

18          38.     All pleadings, motions, and a copy of the register of actions for any lawsuits, court actions,  
19 or administrative proceedings filed against YOU or the ENTITIES from 2020 to 2024.

20          39.     All DOCUMENTS of loans or funds borrowed from Glen March and Strategem  
21 Investments, LLC.

22          40.     All COMMUNICATIONS between YOU and third parties CONCERNING loans or funds  
23 borrowed from Glen March and/or Strategem Investments, LLC.

24          41.     All DOCUMENTS CONCERNING how YOU or the ENTITIES spent the proceeds of  
25 loans or funds borrowed from Glen March and/or Strategem Investments, LLC.

26          42.     All COMMUNICATIONS between YOU and third parties CONCERNING loans or funds  
27 borrowed from Glen March and/or Strategem Investments, LLC.  
28

1 43. All DOCUMENTS CONCERNING repayment of the loans or funds borrowed from Glen  
2 March and/or Strategem Investments, LLC.

3 44. All COMMUNICATIONS between the DEBTOR and third parties CONCERNING loans  
4 or funds borrowed from Glen March and/or Strategem Investments, LLC.

5 45. All DOCUMENTS CONCERNING a demand or request for repayment of loans or funds  
6 borrowed from Glen March and/or Strategem Investments, LLC.

7 46. All COMMUNICATIONS CONCERNING a demand or request for repayment of loans or  
8 funds borrowed from Glen March and/or Strategem Investments, LLC.

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